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June 29, 2004

Mr. J. I. Palmer, Jr., Regional Administrator
U.S. EPA, Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303

RE: June 2004 Early Action Progress Report

Dear Mr. Palmer:

South Carolina Early Action Compacts identify "key" milestones that are required for the continued deferral of the effective date of nonattainment designations and also milestones that track the progress being made by the state and local areas toward adoption and implementation of emission reduction measures. This correspondence identifies the progress made by South Carolina and participating areas since the March 2004 submittal. Enclosure 1 includes the June 2004 Progress Report for each participating county, grouped by the following areas:

Appalachian: Anderson, Cherokee, Greenville, Oconee, Pickens, Spartanburg
Catawba: Chester, Lancaster, Union, York
Pee Dee: Chesterfield, Darlington, Dillon, Florence, Marion, Marlboro
Waccamaw: Georgetown, Horry, Williamsburg
Santee Lynches: Clarendon, Kershaw, Lee, Sumter
Berkeley-Charleston-Dorchester: Berkeley, Charleston, Dorchester
Low Country: Beaufort, Colleton, Hampton, Jasper
Lower Savannah: Aiken, Allendale, Bamberg, Barnwell, Calhoun, Orangeburg
Central Midlands: Fairfield, Lexington, Newberry, Richland
Upper Savannah: Abbeville, Edgefield, Greenwood, Laurens, Saluda

In addition to the progress indicated by each county on the enclosed reports, the South Carolina Department of Health and Environmental Control (Department) is involved with the counties in a number of other projects that benefit air quality. A few of these projects include:

- Mass Transit - The South Carolina Department of Transportation (DOT) in partnership with Santee Wateree and Central Midlands Regional Transit Authority (CMRTA) are resuming "SMARTRIDE." As a result of the positive data collected during the research project in October 2003, DOT determined that there is significant support for a commuter service into Columbia from neighboring towns and cities. Commuters from and around Kershaw, Newberry, and Richland counties will benefit from this project.
- Mass Transit - The CMRTA recently replaced the entire bus fleet for the Columbia and surrounding area with the purchase of 43 new transit buses. Seven of these buses are fueled by compressed natural gas (CNG). The remaining buses utilize clean diesel technology. The reduced emissions from these buses will benefit both Richland and Lexington counties.
- Mass Transit - To encourage mass transit, discounted tickets are being offered to Department staff. This is just one example of how the Department can lead by example to promote emission reduction strategies.

- Landscaping - Through a grant from the Urban Forestry Commission, trees will be planted in front of the main South Carolina Department of Health and Environmental Control building in Columbia. This demonstration project will show how trees help both the quality of air and water.
- Gas Can Exchange Event – Over the last several months, the Department has assisted Richland, Lexington and Greenwood counties with a Gas Can Exchange Event. This event encourages individuals and business to bring an old gas can to exchange for a free, new, environmentally friendly gas can.
- Advanced Travel Center (Truckstop) Electrification (ATE) – The South Carolina Department of Health and Environmental Control, North Carolina Division of Air Quality, and Georgia Environmental Facilities partnered with IdleAire Technologies Corporation and the South Carolina State Energy Office to install 150 ATE truck parking spaces at three truckstops along the I-85 corridor in North Carolina, South Carolina, and Georgia in order to reduce the need for truck idling. The long-term goal of this project is to show that ATE technology can have a positive impact on fuel conservation and can improve local air quality. The site location for South Carolina is in Anderson County.

The Department also continues to be an active partner in the *Sustainable Environment for Quality of Life* (SEQL) project. Meetings held over the last several months include discussions regarding Regional Vulnerability Assessment Program (ReVA), desired results from the program as it relates to air quality issues and to coordinate efforts with other regional efforts. There has also been a meeting to discuss integrated planning and how SEQL can assist local governments.

As stated in the March 2004 submittal, both the 2007 future year modeling emissions inventory and the attainment maintenance analysis have been completed. Information regarding these two Early Action Compact (EAC) milestones, as well as information regarding the modeled control cases is contained in the *DRAFT 8-hour Ozone Modeling Analysis and Attainment Demonstration for South Carolina's Early Action Compact, Technical Support Document*, submitted March 31, 2004. Since Federal controls indicate attainment for the EAC areas in South Carolina in 2007, 2012, and 2017, no additional modeling runs are planned. On June 10, 2004, the Department received draft comments from EPA, Region 4, on the March 2004 submittal and will be addressing these comments in the December 31, 2004, Early Action State Implementation Plan (SIP) submittal due December 31, 2004.

On May 1, 2004, DHEC made the 8-hour Ozone forecast available to the public. This service will continue through September 30, 2004. The forecast is for four areas within South Carolina. These areas include the Upstate, Central Midlands, Central Savannah River and Pee Dee. The Catawba area, including Chester, Lancaster and York counties is included in North Carolina's forecast through a cooperative partnership. A link for the Catawba forecast is included on the Department's website.

Local stakeholder groups continue to meet and upon request the Department attends as many of these meetings as possible to offer technical assistance and updates regarding the 8-hour ozone standard and the early action process.

Upon publication in the June 25th issue of the *State Register*, the EAC regulations will become effective. Regulation 61-62.5, Standard 5.2, Control of Oxides of Nitrogen is a newly developed regulation that targets new stationary sources of NO_x emissions and requires controls equivalent to Best Available Control Technology (BACT). The sources affected by this regulation (≥ 10 mmBTU/hr heat input) are generally those smaller sources that are exempt from BACT because they fall below the emission thresholds. The regulation also requires existing sources that replace their burners to replace them with a low NO_x burner.

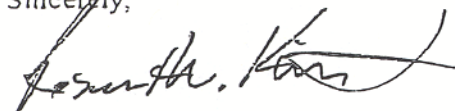
Regulation 61-62.2, Prohibition of Open Burning was revised to prohibit construction waste from being burned. However, the Department allowed an exemption from the ban for single or two family residential construction waste provided that it is burned outside of the ozone season. In addition, the Open Burning regulation was revised to prohibit the burning of household trash. Under the old regulation, household trash could be burned if other disposal services did not exist.

The Department continues to work with the largest existing industrial sources in the more vulnerable areas of South Carolina to reduce NO_x emissions. As stated in the March 2004 submittal, these efforts will result in a reduction of 12,458 tons per year in NO_x emissions from 8 facilities, and these reductions will ultimately be captured through permit limits. Detailed information regarding the specific facilities and the respective reductions will be included in South Carolina's Early Action SIP submittal, December 2004.

The Department is finalizing plans for a public meeting on the Early Action SIP submittal on August 18, 2004. Publication of the Early Action SIP in the State Register is tentatively scheduled for September 2004, allowing for a public hearing in October 2004. This will allow the Department ample time to address issues and concerns and submit the SIP to EPA by December 31, 2004. The Department will notify EPA once these dates are finalized. Recent electronic correspondence has indicated that guidance is being developed to assist the states in completing the Early Action SIP submittal. The Department requests that EPA consider the time required in scheduling public meetings and issuing appropriate notifications of such. The Department would also like for EPA to provide applicable guidance for the Early Action SIP as soon as possible.

The early action process continues to be a positive experience for South Carolina and has provided an increased awareness of air quality issues. As a result, requests for education and outreach assistance and initiatives continues to increase. Thank you for the assistance and support EPA has provided in this process. We look forward to continuing to work with EPA as we implement measures to achieve cleaner air sooner for our citizens. Should you have questions or desire additional information, please do not hesitate to contact me at (803) 896-8940 or Myra Reece, Chief of the Bureau of Air Quality at (803) 898-4123.

Sincerely,



Robert W. King, Jr., P.E.
Deputy Commissioner
Environmental Quality Control

Enclosure: June 2004 Progress Reports for Participating Areas

cc: Kay Prince, EPA Region 4
County Officials (no attachments*)
Ron Methier, GA Dept. of Natural Resources (no attachments*)
Keith Overcash, NC Dept. of Environmental and Natural Resources (no attachments*)
EQC District Directors (no attachments*)

*All those not receiving attachments will be notified when materials are placed on website.